

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION**

RE: DEBORAH DRAPER) Case No. 22 B 00963
)
)
) Chapter 13
Debtor(s))
) Judge: CAROL A DOYLE

AMENDED TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN

COMES NOW Thomas H. Hooper, Chapter 13 Trustee duly appointed to administer the instant case ("Trustee"), and hereby OBJECTS to confirmation of the Chapter 13 plan filed by Debtor(s), in advance of the confirmation hearing set for August 09, 2022 10:30 am, for the following:

Debtor has failed to provide copies to the Trustee of the most recently filed tax returns in accordance with 11 U.S.C. §§ 521(e)(2)(A)(i), and 1325(a)(1).

Debtor has failed to properly fill out schedules as follows in accordance with 11 U.S.C. §§ 521(a)(1)(B)(i):

Debtor to amend schedule A/D/Plan to include PIN for property at 7302 S. Dorchester.

Debtor to amend schedule I to list rent from father and property management income.

The plan fails to address the following secured claim(s) as required by 11 U.S.C. §§ 1325(a)(1) and/or 1325(a)(5): Cook County Treasurer.

WHEREFORE, the Trustee prays the Court to enter an Order denying confirmation of the proposed Chapter 13 plan, and for such other and further relief as the Court may deem just and proper. In the alternative, the Trustee requests a hearing on the matter.

Dated: August 05, 2022

/s/ Thomas H. Hooper

Thomas H. Hooper
Chapter 13 Trustee
55 E. Monroe St., Suite 3850
Chicago, IL 60603
(312) 294-5900

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CERTIFICATE OF SERVICE

I, Kelleye Robinson, do hereby certify that I am, and at all times hereinafter mentioned was, more than eighteen (18) years of age; and that on the date indicated herein below, I served copies of the foregoing TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN by depositing a copy of the same in a postage-paid envelope with the United States Postal Service or by electronic means, as indicated.

DAVID FREYDIN
Attorney for Debtor

(via CM/ECF)

Patrick Layng
United States Trustee

(via CM/ECF)

DEBORAH DRAPER
7302 S DORCHETER #A
CHICAGO, IL 60619
Debtor

(via U.S. Postal Service)

Dated: August 05, 2022

/s/ Kelleye Robinson

Kelleye Robinson
Office of the Chapter 13 Trustee
55 E. Monroe St., Suite 3850
Chicago, IL 60603
(312) 294-5900